

August 4, 2005

To: National Organic Standards Board
From: The Synergy Company of Utah
Susan Ulery, Director of Regulatory Affairs

Re: Handling Committee - Recommendations on defining agricultural and non-agricultural products, yeast specifically

Dear NOSB members,

The Synergy Company urges the NOSB to re-work the Handling Committee's suggested definitions of "agricultural" and "non-agricultural" to allow materials, such as organically produced yeast, to qualify as agricultural products that can then be certified to the NOP standard for use in processed organic products.

As a philosophical matter, Synergy supports efforts to increase organic agriculture and to broaden the scope of organic products that are made available to consumers. We urge the NOSB to support organic products in every category when it is possible for an organic production method to produce an organic product to replace a "conventional" product that employs the use of chemical inputs and other additives that are (for good reasons) not allowed in producing organic production. This is the driving passion that brought Synergy and many other companies and individuals to the organic certification movement. In our view, organic yeast is vastly superior to non-organic yeast as an ingredient, and organic goods should contain the greatest percentage of organic ingredients possible (in line with NOP 205.606). Yeast is ubiquitous and is a necessary ingredient in many organic products. It defies understanding how any member of NOSB could support an arbitrary classification that would allow organic producers to use non-organic yeast, when yeast that is produced to organic standards has been developed.

Synergy will use organically produced yeast in the organic, whole-food vitamin and mineral products that we formulate, manufacture and distribute. We formulate our products to be certified organic whole-food supplements of the best quality we can offer to our customers. Synergy has invested a great deal of money and time in the research and development leading to what is a new class of organic product: a whole-food vitamin and mineral supplement that is certified organic to the NOP standard. Certification is based in large part upon organically produced yeast, which is integral to the product's growth.

The Handling Committee's attempt to define yeast as a "non-agricultural substance" while defining mushrooms as an "agricultural product" is not logical, it is not supportable and it is just plain wrong in the context of the NOP. It may be that this thinking is rooted in short-sighted and limited concepts that look for any connection, however tenuous, to soil-based production as the "true organic"

method. Food is produced in systems that do not require soil, and the organic industry should make every effort to ensure that food, whether the result of aquaculture, soil-based production, wild-crafting, tank farming, hydroponic farming or whatever new system we humans next develop, is organically produced. Limited thinking will shortly make the NOP an anachronism. We point out, for example, that algae are single-celled organisms, yeast are single-celled organisms; yeast are grown in a solution, as are algae (chlorella and Spirulina can be and are grown in closed tank systems under carefully controlled conditions). Both algae and yeast can be grown under organic production systems or non-organic production systems, depending upon the inputs used.

The EU organic standard allows for yeast to be certified organic, and yeast is classified as an agricultural product under the EU system. The NOP standard should not offer *less* opportunity or *less* support to organic producers than the EU, nor allow NOP-certified products to be *less organic* than their EU counterparts.

Please take the long view for the future of organic products and support Marroquin Organic Commodities Services, Inc. petition to reclassify yeast as an “agricultural product”. Our company will then do its part and include organic yeast in the production of our whole-food Vita Synergy™ vitamin and mineral products, offering our customers a certified organic supplement to their diets.

Sincerely,

Susan Ulery
The Synergy Company of Utah, LLC
Director of Regulatory Affairs